



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

VIA ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Caitlin Schiebel
Cardinal Operating Company
CSchiebel@ohioec.org

Re: Information Request under Section 114 of the Clean Air Act
Cardinal Power Plant
Brilliant, Ohio

Dear Caitlin Schiebel:

Pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a), the U.S. Environmental Protection Agency is requiring Cardinal Operating Company (Cardinal or you) to submit information about your Cardinal Power Plant in Brilliant, Ohio.

This information is needed to determine whether the Cardinal Power Plant is in compliance with certain requirements of the CAA and its implementing regulations. Section 114(a) of the CAA authorizes the Administrator of the EPA to require any person who owns and operates an emission source, whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. This authority has been duly delegated to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you

must submit. **You must send this information to us within 30 calendar days after you receive this request.**

We ask Cardinal to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Jacob Herbers at Herbers.Jacob@epa.gov or (312) 886-0405 or Matthew Walters at Walters.Matthew@epa.gov or (312) 353-4724 to make arrangements to submit your response.

Cardinal must submit all required information accompanied by the following certification, signed and dated by a responsible official of Cardinal:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Cardinal to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Jacob Herbers at (312) 886-0405 or Matthew Walters at (312) 353-4724.

Sincerely,

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Enclosure

cc: James Kavalec, Manager
Division of Air Pollution Control
Ohio Environmental Protection Agency
James.Kavalec@epa.ohio.gov

Devan Roof, APC Manager
Southeast District Office
Ohio Environmental Protection Agency
Devan.Roof@epa.ohio.gov

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Microsoft Excel-compatible format, and not in image format. If Excel format is not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the Facility's Title V Permit, the CAA, 42 U.S.C. §§ 7401 *et seq.*, 40 C.F.R. Part 63 Subparts A and UUUUU, or other CAA implementing regulations.

1. The terms "document" and "documents" means any object that records, stores, or presents information, and includes: email; writings; memoranda; contracts; agreements; records; or information of any kind, formal or informal, whether handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy. All documents in hard copy shall also include attachments to or enclosures with any document.
2. The terms "Cardinal" or "you" or "your" includes, Cardinal Operating Company, LLC, Buckeye Power, Inc., American Electric Power Co., Inc., and any assumed or related business names, affiliates, agents, representatives, employees, contractors, parent organizations, predecessor corporations, successor corporations, subsidiary organizations, affiliates, and assignee organizations or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of these companies or organizations.

Appendix B

Information You Are Required to Submit to EPA

Cardinal must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) for each coal-fired unit at the Cardinal Power Plant, within 30 days of receipt of this Request for Information.

1. Provide a detailed description of how particulate emissions are controlled and monitored at each unit. Include the continuous opacity monitoring system (COMS), continuous particulate matter emission monitoring (PM CEMS), and/or alternative monitoring system model and manufacturer information, the electrostatic precipitator (ESP) model and manufacturer information, the design specification(s) for the ESP, a description of the ESP automatic control systems, a list of ESP parameters monitored (e.g., gas velocity, temperature, voltage, etc.), and ESP operation and maintenance procedures. Provide ESP inspection and repair records for each unit for the past five years.
2. Provide a detailed description of how mercury emissions are controlled and monitored at each unit. Include the mercury CEMS model and manufacturer information (and/or mercury sorbent trap information, if applicable), sorbent type utilized, sorbent manufacturer, the manufacturer's specification(s) for the sorbent, the design specification(s) for the sorbent injection system, the sorbent system designed maximum injection rate, the sorbent system design and guaranteed mercury removal rate, and the location of each sorbent injection lance.
3. If a fuel additive is added to help control mercury emissions from the unit, provide the manufacturer of the additive, the manufacturer's specifications for the additive, the design specification for the additive spray and/or injection system, the concentration of the additive utilized, the design and/or guaranteed mercury removal rate, location of addition of the fuel additive (e.g., sprayed on coal prior to pulverization) and the average rate and maximum rate of addition from January 1, 2019, to the date of this request.
4. Provide a single, unlocked, Excel-compatible spreadsheet of hourly data for each unit from January 1, 2019, to the date of this request that includes the following:
 - a. date and time;
 - b. heat input rate (MMBtu/hr);
 - c. average generation (MWg);
 - d. opacity (%);
 - e. particulate matter emissions (lb/MMBtu);
 - f. any monitored ESP parameters identified in response to Request 1;
 - g. mercury inlet rate (lbs/TBtu), if not available, provide mercury coal analysis results and analysis for this time period;
 - h. mercury outlet rate (lbs/TBtu);
 - i. mercury outlet rate (lbs/GWh);
 - j. mercury 30-day rolling average MATS emissions rate;

- k. note any periods of mercury limit exceptions and the reason for the exception (e.g., startup); and
 - l. sorbent type and injection rate (tons/hr or gallons/hr and concentration).
- 5. Provide a copy of all Title V deviation reports from January 1, 2019, to date of this request.
- 6. If not already included in response to Request 5, provide a record of operation of each unit without monitoring equipment (including CEMS and COMS) and/or control equipment (including ESP and sorbent injection) that includes date, time, hours, reason, and corrective actions taken (if any) for each such event since January 1, 2019.
- 7. If not already included in response to Request 5, provide a record of operation of each unit in excess of any applicable pollutant limit specified in Permit No. P0089700 that includes date, time, hours, reason, and corrective actions taken (if any) for each such event since January 1, 2019.
- 8. Provide a list of any planned or proposed modifications to the mercury control system and the particulate control system at each unit.
- 9. Provide copies of all stack test reports for Mercury since January 1, 2019.